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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

# UNITED STATES OF AMERICA

**Plaintiff(s),**

V.

CLIVEN D. BUNDY

## Defendant.

Case No.:  
2:16-CR-00046-GMN-PAL-1

**MOTION FOR LEAVE TO FILE SUPPLEMENT TO DEFENDANT CLIVEN BUNDY'S  
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISQUALIFY JUDGE  
GLORIA NAVARRO UNDER 28 U.S.C. §144**

Comes now, Defendant Cliven Bundy, and moves this Court pursuant to Local Rule LR  
7-2(g) for leave to file the pleading entitled: DEFENDANT CLIVEN BUNDY'S AMENDED AND  
SUPERSEDING MOTION TO DISQUALIFY JUDGE GLORIA NAVARRO AND  
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISQUALIFY JUDGE GLORIA  
NARRAVARO UNDER 28 U.S.C. §144 AND/OR REQUEST FOR VOLUNTARY RECUSAL;  
AND RENEWED MOTION FOR PRO HAC E VICE STATUS FOR LARRY KLAYMAN.

Mr. Hansen must apologize to the Court, because his brand new Federal Court Rule Book does not set forth a Rule LR 7-2(g). It ends at 2 (f). Nevertheless, the Defendant represents to the Court that the original Motion to Disqualify was prepared and filed in some haste, and, over the

1 weekend, and on further reflection, Defense Counsel realized that some basic changes needed to be  
2 made in the motion to remove some fairly severe language and make the assertions in the Motion  
3 more reasonable.

4 For instance, the assertion that “Senator Harry Reid and his son Rory Reid have had a high  
5 priority for years to steal the Bundy’s land” was edited to say “Senator Harry Reid and his son Rory  
6 Reid have been implicated in numerous internet articles as having a personal financial interest . . .”  
7 And so forth. The Court will note a considerable change in the tone of the language in the body of  
8 the Motion, which Counsel felt was necessary in reviewing the Motion over the weekend. Also,  
9 there were assertions of fact which were made in the original Motion which, upon further research,  
10 were found to be outdated or erroneous. For example, the assertion that “U.S. Senator Harry Reid  
11 has called upon the Office of the District Attorney for Clark County to prosecute Bundy and his  
12 family assertion” was found to be overstating the case, because what the news stories actually  
13 reflected was that “U.S. Senator Harry Reid spoke with Attorney General Eric Holder, FBI leaders  
14 and **Clark County Sheriff Doug Gillespie**. Reid said he understands there is a task force being set  
15 up to deal with Bundy, and Gillespie is involved as well.”  
16

17 Other corrections needed to be made in the factual assertions of the original brief, and Mr.  
18 Hansen made those because he strives to be accurate and the information he was relying upon in the  
19 original brief proved to be somewhat erroneous, and Mr. Hansen has striven in the Amended and  
20 Superseding Motion to correct those errors.  
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1       For these reasons, Defendant Bundy requests this Court to grant leave under LR7-2(g) to file  
2 the Amended and Superseding Motion, etc., as set forth above. A copy of the proposed Motion is  
3 attached hereto and incorporated herein by reference.

4 Dated: May 24, 2016

Respectfully submitted,

/s/ Joel F. Hansen, Esq.

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Of Counsel

*(Pro Hac Vice Application Pending)*

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2016, I electronically filed the foregoing MOTION FOR LEAVE TO FILE SUPPLEMENT TO DEFENDANT CLIVEN BUNDY'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISQUALIFY JUDGE GLORIA NAVARRO UNDER 28 U.S.C. §144 with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to opposing counsel registered on CM/ECF.

/s/ Joel F. Hansen, Esq.

**JOEL F. HANSEN, ESQ.**